## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

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ERIC WALDENMAIER, on behalf of Himself and other similarly situated

Plaintiff,

v. : Case Number: 3:23-cv-466 (HEH)

PAYMERANG, LLC,

Defendant. :

# JOINT MOTION FOR STIPULATED PROTECTIVE ORDER

Plaintiff Eric Waldenmaier, on behalf of himself and others similarly situated ("Waldenmaier" or "Plaintiff") and Defendant Paymerang, LLC ("Paymerang" or "Defendant) (collectively, "the Parties"), by and through their respective counsel, here move this Court for entry of a Stipulated Protective Order.

- 1. The Protective Order would expedite the flow of discovery materials, facilitate the prompt resolution of discovery disputes and confidentiality concerns, protect certain material designated as confidential ("Confidential Materials") and ensure that protection is afforded only to material so designated as confidential.
- 2. Counsel for the parties have conferred and agree the Confidential Materials are potentially relevant to the claims and defenses asserted in this action, that the parties have a substantial need fo them, but recognize that access to the materials should be restricted.
- 3. As a result, counsel for the Parties have conferred and agree to the entry of the attached proposed Stipulated Protective Order.

- 4. Recognizing the Court's disfavor for sealed filings, the Parties agree to 1) attempt to ensure the use of a "CONFIDENTIAL" or "ATTORNEY'S EYES ONLY" designation, as described in the attached proposed Stipulated Protective Order, is limited only to circumstances where it is unambiguously appropriate and 2) agree to collaboratively use redactions in filings whenever possible so as to avoid the filing of motions to seal.
  - 5. This motion is supported by good cause.

WHEREFORE, the Parties hereby respectfully request that this Joint Motion for Protective Order be granted.

Dated: February 13, 2024

Respectfully submitted,

#### /s/ Eric P. Burns

Eric P. Burns, VSB# 76554
Alyssa B. Testo, VSB# 97254
JACKSON LEWIS P.C.
10701 Parkridge Blvd., Suite 300
Reston, Virginia 20191
(703) 483-8300
(703) 483-8301 (Facsimile)
Eric.Burns@jacksonlewis.com
Alyssa.Testo@jacksonlewis.com
Counsel for Defendant

#### /s/ Zev H. Antell

Craig Juraj Curwood, Esq. Zev H. Antell, Esq. Samantha R. Galina, Esq. Butler Curwood, PLC 140 Virginia Street, Suite 302 Richmond, Virginia 23219 Telephone: 804-648-4848

Fax: 804-237-0413

Email: <a href="mailto:craig@butlercurwood.com">craig@butlercurwood.com</a>
<a href="mailto:seventessan="mailto:seventessan="mailto:craig@butlercurwood.com">seve@butlercurwood.com</a>
<a href="mailto:seventessan="mailto:sevent

Counsel for Plaintiff

### **CERTIFICATE OF SERVICE**

I hereby certify that on February 13, 2024, I caused a true and correct copy of the foregoing to be served via electronic mail on the following:

Craig Juraj Curwood, Esq. Zev H. Antell, Esq. Samantha R. Galina, Esq. Butler Curwood, PLC 140 Virginia Street, Suite 302 Richmond, Virginia 23219 Telephone: 804-648-4848

Fax: 804-237-0413

Email: <a href="mailto:craig@butlercurwood.com">craig@butlercurwood.com</a>
<a href="mailto:samantha@butlercurwood.com">samantha@butlercurwood.com</a>

Counsel for Plaintiff

/s/ Eric P. Burns

Eric P. Burns, VSB# 76554 JACKSON LEWIS P.C. 10701 Parkridge Blvd., Suite 300 Reston, Virginia 20191 (703) 483-8300 (703) 483-8301 (Facsimile) Eric.Burns@jacksonlewis.com Counsel for Defendant

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